

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:
CITY OF DETROIT, MICHIGAN

Chapter: 9

Case No.: 13-53846

Debtor(s)

Judge: THOMAS J. TUCKER

RAYMOND THOMPSON JR.,
AND TAESEAN PARNEL
a minor by his next friend CORLISS THOMAS

Creditor(s)

**CREDITORS MOTION FOR RECONSIDERATION AND/OR FOR RELIEF FROM
JUDGMENT OF THE ORDER GRANTING DEBTOR CITY OF DETROIT'S MOTION
TO EXCLUDE CREDITOR RAYMOND THOMPSON JR. FROM DISBURSEMENT
DESPITE TIMELY SUBMISSION OR ALTERNATIVE RELEASE FROM ORDER**

Now comes Creditor Raymond Thompson Jr. by and through his undersigned counsel,
ROMANO LAW, P.L.L.C., and for their Motion for Reconsideration of the Order Granting
Debtor's Motion to Exclude Creditor Raymond Thompson Jr. from Disbursement Despite
Timely Submission would aver unto this Honorable Court as follows:

1. On or around March 16, 2022, the Debtor's filed a Motion for an Order (a) Approving First and Final Distribution of New B Notes to Holders of Allowed Class 14 Claims Under The City's Plan of Adjustment and (B) Granting Other Related Relief. (Exhibit A)
2. On or around March 16, 2022, the Debtor's filed a notice of Opportunity to Object to City of Detroit's Motion for an Order (a) Approving First and Final Distribution of New B Notes to Holders of Allowed Class 14 Claims Under The City's Plan of Adjustment and (B) Granting Other Related Relief. (Exhibit B)
3. That on May 25, 2021, Creditor's Raymond Thompson Jr., Gregory Brazell and Taesean Parnel a minor by his next friend Corliss Thomas completed and mailed together in one envelope via FedEx Overnight the requested documents: Brokerage Account and Direction and W-9 forms. (Exhibit C)
4. That on Wednesday, May 26, 2021, at 10:03 am the requested documents for Creditor's Raymond Thompson Jr., Gregory Brazell and Taesean Parnel a minor by his next friend Corliss Thomas were delivered and signed for by M. Torres. (Exhibit C)
5. That Creditor Taesean Parnel a minor by his next friend Corliss Thomas is included in the distribution of the New B notes to Claimants. (Exhibit D)
6. That Creditor Raymond Thompson Jr. is being excluded from his claim for failure to timely return brokerage and tax information documents when in fact his documents were submitted in a timely fashion and were included in the FedEx Envelope with Gregory Brazell and

Taesean Parnel a minor by his next friend Corliss Thomas. Three Creditor's documents were sent together, resulting in all three being received. (Exhibit E)

7. On or around May 20, 2022, the Debtor's filed a Certification of No Response or Objection Regarding City of Detroit's Motion for an Order (a) Approving First and Final Distribution of New B Notes to Holders of Allowed Class 14 Claims Under the City's Plan of Adjustment and (B) Granting Other Related Relief to include Creditor Raymond Thompson Jr. (Exhibit F)
8. On or around May 20, 2022, the Order (A) Approving First and Final Distribution of New B Notes to Holders of Allowed Class 14 Claims Under the City's Plan of Adjustment and (B) Granting Other Related Relief was signed by Judge Thomas J. Tucker. (Exhibit G)
9. The Creditor's attorney's office received the resignation of one of its attorney's, this resignation occasioned some chaos, which led to the Creditor's attorney failure to furnish a response to the Debtor's Notice of Opportunity to Object to City of Detroit's Motion for an Order (A) Approving First and Final Distribution of New B Notes to Holders of Allowed Class 14 Claims Under the City's Plan of Adjustment and (b) Granting Other Related Relief in a timely fashion.
10. Had the Creditor's attorney filed a timely response to the Debtor's motion, this Honorable Court's decision would likely have been different.
11. Under Rule 60 sub (a)(b) this court may grant relief from a judgment or order for reasons of mistake, inadvertence, surprise, or excusable neglect.

12. Under Rule 60 sub (c)(d) this court has the power to entertain the relieve from a judgment, order or proceeding.

WHEREFORE, the Plaintiff respectfully requests that this Honorable Court grant the Creditor's Motion for Reconsideration or Alternative Release Creditor's from Order as herein submitted.

Respectfully submitted,

ROMANO LAW, PLLC

By: /s/ Daniel G. Romano
DANIEL G. ROMANO (P49117)
ROMANO LAW, PLLC
Attorneys for Plaintiff
23880 Woodward Avenue
Pleasant Ridge, MI 48069
(248) 750-0270